

**To:** Argyropoulos, Paul[Argyropoulos.Paul@epa.gov]  
**From:** Larry Schafer  
**Sent:** Tue 8/26/2014 3:36:00 PM  
**Subject:** RE: Catching up

Are you working on Friday?

-----  
Larry Schafer

National Biodiesel Board

O: 202.737.8801

M: 202.997.8072

[LSchafer@Biodiesel.org](mailto:LSchafer@Biodiesel.org)  
-----

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[www.americasadvancedbiofuel.com](http://www.americasadvancedbiofuel.com)

1331 Pennsylvania Ave. NW

Suite 505

Washington DC 20004

**From:** Argyropoulos, Paul [mailto:Argyropoulos.Paul@epa.gov]  
**Sent:** Monday, August 11, 2014 10:31 AM  
**To:** Larry Schafer  
**Cc:** Anne Steckel  
**Subject:** RE: Catching up

Hi Larry and Anne,

I can certainly check in with Chris on your request. His schedule is pretty tight over the next few weeks (both here and in Ann Arbor) however I'll see if he can offer up some times. However, he will be out of the office beginning next Thursday and not back in until the week of Sept 7<sup>th</sup>. It may be it will have to wait until his return. I'll see what's possible.

Thanks, Paul

Paul Argyropoulos

Senior Policy Advisor

US EPA

Office of Transportation and Air Quality

Phone: 202-564-1123

Mobile: 202-577-9354

Email: [argyropoulos.paul@epa.gov](mailto:argyropoulos.paul@epa.gov)

Web: [www.epa.gov](http://www.epa.gov)

**From:** Larry Schafer [<mailto:lschafer@biodiesel.org>]

**Sent:** Monday, August 04, 2014 4:02 PM

**To:** Argyropoulos, Paul

**Cc:** Anne Steckel

**Subject:** Catching up

Paul,

Would like to see if there might be time in Chris's schedule to have lunch or coffee with Anne.

They have not had much if any opportunity to communicate directly with each other and thought we would extend an invitation to Chris.

Please let me know, whether you think we can get them together during the next couple of weeks or so.

Thank you.

-----

Larry Schafer

National Biodiesel Board

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-----

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Suite 505

Washington DC 20004

**To:** Argyropoulos, Paul[Argyropoulos.Paul@epa.gov]  
**From:** Jonathan Birdsong  
**Sent:** Thur 8/14/2014 3:59:22 PM  
**Subject:** Fwd: Arundo donax importation and Chemtex

Paul -

Per your suggestion, I have tried to contact John Weihrauch several times re: Chemtex's application to import cellulosic ethanol to the U.S. from Italy. As you know, we worked diligently with USDA for months to get their approval - and did. We submitted our application with USDA's approval in the spring and despite my many calls and e-mails to Mr. Weihrauch, have yet to have a return call or e-mail on the application's status.

Chemtex's application for importation was mentioned in the proposed 2014 RVO rule as a positive sign for the cellulosic ethanol industry. We are hopeful that we can get approval before the final 2014 rule is issued, as we have done everything the 2013 rule on *Arundo donax* has asked for.

Thanks,

Jonathan Birdsong  
BlueWater Strategies  
25 Massachusetts Ave., NW - Suite 820  
Washington, DC 20001  
(202) 589-1757 - Direct  
(202) 491-5559 - Cell  
[jbirdsong@bwstrategies.com](mailto:jbirdsong@bwstrategies.com)

Begin forwarded message:

**From:** Jonathan Birdsong <[jbirdsong@bwstrategies.com](mailto:jbirdsong@bwstrategies.com)>  
**Date:** July 28, 2014 at 10:05:28 AM PDT  
**To:** "Weihrauch.john@Epa.gov" <[Weihrauch.john@Epa.gov](mailto:Weihrauch.john@Epa.gov)>  
**Subject:** RE: Arundo donax importation and Chemtex

John -

Checking in again on the importation issue re: *Arundo donax*. Please let me know when would be a good time to schedule a call.

Thanks,

Jonathan Birdsong

**From:** Jonathan Birdsong  
**Sent:** Tuesday, July 15, 2014 3:04 PM  
**To:** 'Weihrauch.john@Epa.gov'  
**Subject:** FW: Arundo donax importation and Chemtex

Hi John –

Paul Argyropoulos recommended that I contact you. I represent Chemtex, and on May 20, 2014 they submitted their paperwork to EPA to get their cellulosic ethanol approved for importation per the July 11, 2013 rule on *Arundo donax* (hyperlinks active). The facility has been certified and the USDA has also approved of the process (see attachments). This satisfies the requirements pursuant to the rule, and was hoping that I could get a status update from the Agency on where things stand.

Thanks and please contact me anytime with questions/comments.

Sincerely,

Jonathan Birdsong

BlueWater Strategies

25 Massachusetts Ave., NW – Suite 820

Washington, DC 20001

[jbirdsong@bwstrategies.com](mailto:jbirdsong@bwstrategies.com)

(202) 589-1757 – Direct

(202) 491-5559 – Cell

**From:** Jonathan Birdsong

**Sent:** Thursday, July 10, 2014 10:47 AM

**To:** Paul Argyropoulos; Sharyn Lie

**Subject:** Fwd: Arundo donax importation and Chemtex

Paul and Sharyn -

Is there a time this week or next that we can follow up on this? I want to make sure the Agency has everything they need from us.

Thanks,

Jonathan Birdsong

BlueWater Strategies

25 Massachusetts Ave., NW - Suite 820

Washington, DC 20001

(202) 589-1757 - Direct

(202) 491-5559 - Cell

[jbirdsong@bwstrategies.com](mailto:jbirdsong@bwstrategies.com)

Begin forwarded message:

**From:** Jonathan Birdsong <[jbirdsong@bwstrategies.com](mailto:jbirdsong@bwstrategies.com)>  
**Date:** July 2, 2014 at 11:02:44 AM EDT  
**To:** "Paul Argyropoulos ([argyropoulos.paul@epa.gov](mailto:argyropoulos.paul@epa.gov))"  
<[argyropoulos.paul@epa.gov](mailto:argyropoulos.paul@epa.gov)>, "Lie, Sharyn" <[Lie.Sharyn@epa.gov](mailto:Lie.Sharyn@epa.gov)>  
**Subject:** **Arundo donax importation and Chemtex**

Hi Paul and Sharyn –

I'm checking to see where Chemtex is in the process at EPA re: the importation of their cellulosic ethanol derived from *Arundo donax* from Italy to the U.S. (see attached letter).

As you know, according to the rule on *Arundo donax* issued last July, USDA has to approve the importation prior to EPA consideration. The USDA took the first step (attached pdf) and now it has to be approved by the EPA to clear the way for importation.

Thanks for all of your help on this. You can contact me anytime with further questions or comments.

Sincerely,

Jonathan Birdsong

BlueWater Strategies, LLC

25 Massachusetts Ave., NW – Suite 820

Washington, DC 20001

(202) 589-1757 – Direct

(202) 491-5559 – Cell

[Jbirdsong@bwstrategies.com](mailto:Jbirdsong@bwstrategies.com)

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No virus found in this message.

Checked by AVG - [www.avg.com](http://www.avg.com)

Version: 2014.0.4336 / Virus Database: 3722/7245 - Release Date: 03/25/14

Internal Virus Database is out of date.



**To:** Argyropoulos, Paul[Argyropoulos.Paul@epa.gov]; Hengst, Benjamin[Hengst.Benjamin@epa.gov]  
**From:** Larry Schafer  
**Sent:** Tue 8/5/2014 2:40:29 PM  
**Subject:** Here is the source ... Informa Economics

## **Odds Increasing 2014 Biodiesel RFS Volume Requirement Will Be Higher Than Initially Proposed**

EPA initially proposed an unchanged, 1.28 billion gallon level for 2014 Renewable Fuel Standard (RFS) volume requirements. But indications signal the level could be increased to around 1.48 billion gallons. The 2014 corn-based ethanol volume is expected to be between 13.5 to 13.8 billion gallons, with 13.6 billion cited by some contacts.

The date as to when the information will be announced is still murky. EPA could send its final proposal to the Office of Management & Budget (OMB) sometime this week. If so, it would take a minimum of 30 days for OMB review, and perhaps several months, with some sources speculating the announcement could still come after November elections.

-----  
Larry Schafer  
National Biodiesel Board  
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M: 202.997.8072  
[LSchafer@Biodiesel.org](mailto:LSchafer@Biodiesel.org)  
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Washington DC 20004

**To:** Argyropoulos, Paul[Argyropoulos.Paul@epa.gov]  
**Cc:** Anne Steckel[asteckel@biodiesel.org]  
**From:** Larry Schafer  
**Sent:** Mon 8/4/2014 8:02:21 PM  
**Subject:** Catching up

Paul,

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They have not had much if any opportunity to communicate directly with each other and thought we would extend an invitation to Chris.

Please let me know, whether you think we can get them together during the next couple of weeks or so.

Thank you.

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Washington DC 20004

**To:** Argyropoulos, Paul[Argyropoulos.Paul@epa.gov]  
**From:** Michael.McAdams@hklaw.com  
**Sent:** Thur 7/31/2014 6:26:48 PM  
**Subject:** Re: Extension of the 2013 RFS Volume Standard Compliance Dates

Thanks paul for forwarding. So enjoyed our conversation the other day.

-----  
Sent using BlackBerry

**From:** Argyropoulos, Paul [mailto:Argyropoulos.Paul@epa.gov]  
**Sent:** Thursday, July 31, 2014 02:09 PM Eastern Standard Time  
**Subject:** Extension of the 2013 RFS Volume Standard Compliance Dates

**To Interested Parties:**

EPA is taking direct final action to extend the compliance deadline for the 2013 renewable fuel standards (RFS). The current deadline is September 30, 2014. The new deadline will be 30 days following publication in the Federal Register of the final 2014 RFS Standards. This is being done to assist industry with managing their compliance with both the 2013 and 2014 renewable fuel standards. The action is being taken because we are still working on the 2014 RFS final standards and we are taking the time to get them right. The Agency intends to issue the final 2014 RFS RVO as soon as possible. This extension is not intended to signal a delay, but instead ensures that the 2013 compliance deadline is directly linked to the 2014 RVO promulgation date to improve EPA's efficiency in implementing the program this year. This extension would allow for any necessary adjustment to the compliance deadline should the interagency process not conclude in time to support the current compliance schedule.

For more information: <http://epa.gov/otaq/fuels/renewablefuels/regulations.htm>

Best Regards, Paul

Paul Argyropoulos

Senior Policy Advisor

US EPA

Office of Transportation and Air Quality

Phone: 202-564-1123

Mobile: 202-577-9354

Email: [argyropoulos.paul@epa.gov](mailto:argyropoulos.paul@epa.gov)

Web: [www.epa.gov](http://www.epa.gov)

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**To:** Argyropoulos, Paul[Argyropoulos.Paul@epa.gov]  
**From:** Larry Schafer  
**Sent:** Thur 7/24/2014 4:23:36 PM  
**Subject:** RE: any chance you can get away from your desk for a few minutes today?

Ok .. can we set a time ... ?

-----  
Larry Schafer

National Biodiesel Board

O: 202.737.8801

M: 202.997.8072

[LSchafer@Biodiesel.org](mailto:LSchafer@Biodiesel.org)

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**From:** Argyropoulos, Paul [mailto:Argyropoulos.Paul@epa.gov]  
**Sent:** Thursday, July 24, 2014 11:13 AM  
**To:** Larry Schafer  
**Subject:** RE: any chance you can get away from your desk for a few minutes today?

Sorry. It's been on heck of a week.

Maybe next week.

Paul Argyropoulos

Senior Policy Advisor

US EPA

Office of Transportation and Air Quality

Phone: 202-564-1123

Mobile: 202-577-9354

Email: [argyropoulos.paul@epa.gov](mailto:argyropoulos.paul@epa.gov)

Web: [www.epa.gov](http://www.epa.gov)

**From:** Larry Schafer [<mailto:lschafer@biodiesel.org>]

**Sent:** Thursday, July 24, 2014 10:38 AM

**To:** Argyropoulos, Paul

**Subject:** any chance you can get away from your desk for a few minutes today?

-----  
Larry Schafer

National Biodiesel Board

O: 202.737.8801

M: 202.997.8072

[LSchafer@Biodiesel.org](mailto:LSchafer@Biodiesel.org)

-----  
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Washington DC 20004

**To:** Argyropoulos, Paul[Argyropoulos.Paul@epa.gov]  
**From:** Larry Schafer  
**Sent:** Thur 7/24/2014 2:38:07 PM  
**Subject:** any chance you can get away from your desk for a few minutes today?

-----  
Larry Schafer  
National Biodiesel Board  
O: 202.737.8801  
M: 202.997.8072  
[LSchafer@Biodiesel.org](mailto:LSchafer@Biodiesel.org)  
-----

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[www.americasadvancedbiofuel.com](http://www.americasadvancedbiofuel.com)

1331 Pennsylvania Ave. NW  
Suite 505  
Washington DC 20004



**To:** Argyropoulos, Paul[Argyropoulos.Paul@epa.gov]  
**From:** Michael.McAdams@hklaw.com  
**Sent:** Wed 7/23/2014 7:25:35 PM  
**Subject:** good chat with Chris yesterday.

Paul: Meeting went very well yesterday love to catch you up when you have free time. Also solid chat with Chris yesterday. Thanks, for passing along. All the best,

**Michael McAdams** | Holland & Knight

**President, ABFA**  
Sr Policy Advisor  
800 17th Street, NW Suite 1100 | Washington DC 20006  
Phone 202.469.5140 | Fax 202.955.5564  
[michael.mcadams@hklaw.com](mailto:michael.mcadams@hklaw.com) | [www.hklaw.com](http://www.hklaw.com)

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**To:** Argyropoulos, Paul[Argyropoulos.Paul@epa.gov]; Grundler, Christopher[grundler.christopher@epa.gov]  
**From:** Brooke Coleman  
**Sent:** Wed 7/23/2014 3:38:51 PM  
**Subject:** Fwd: BIOFUELS UPDATE: \*\*\*Abengoa Foresees Kansas Cellulosic Ethanol Plant Output By Late Summer

Subject: FW: BIOFUELS UPDATE: \*\*\*Abengoa Foresees Kansas Cellulosic Ethanol Plant Output By Late Summer

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From: opisethanol@opisnet.com  
Sent: Wednesday, July 23, 2014 11:26:29 AM (UTC-05:00) Eastern Time (US & Canada)  
To: OPIS Ethanol Updates  
Subject: BIOFUELS UPDATE: \*\*\*Abengoa Foresees Kansas Cellulosic Ethanol Plant Output By Late Summer

2014-07-23 11:26:23 EDT  
\*\*\*Abengoa Foresees Kansas Cellulosic Ethanol Plant Output By Late Summer

Global biofuels producer Abengoa expects its 25-million gal/yr cellulosic ethanol plant in Hugoton, Kan., to start producing by the end of the summer, according to a company official.

"We are still progressing toward startup of the cellulosic ethanol portion of the facility and have started the commissioning process," Christopher Standlee, executive vice president of global affairs, told OPIS. "We expect to have some production in late August or early September."

The company previously indicated that production might start by the middle of this month and that it had hoped to reach capacity by the end of September. Standlee called that timeline "fairly aggressive," adding: "Realistically, we will be very happy if we get up to consistent full-scale production by the end of the year at that 25-million-gallon rate."

Construction on the Kansas plant started in late 2011. It is also to produce up to 20 megawatts/yr of electricity from biomass, with corn stover used as feedstock.

In the United States, Abengoa currently operates a slew of ethanol plants in Illinois, Nebraska, Indiana and New Mexico. The company also operates several biofuel plants in Europe.

--Michael Schneider, mschneider@opisnet.com

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**To:** Baumes, Harry - OCE[HBaumes@oce.usda.gov]; Randy Russell[russell@russellgroupdc.com]; cfdcinc@aol.com[cfdcinc@aol.com]; Lloyd Ritter[lritter@greencapitol.net]; ecs.obrien4@comcast.net[ecs.obrien4@comcast.net]; Argyropoulos, Paul[Argyropoulos.Paul@epa.gov]; Samantha Slater[SSlater@ethanolrfa.org]; Duffield, James - OCE[JDuffield@oce.usda.gov]; Xiarchos, Irene - OCE[IXiarchos@oce.usda.gov]; Vasavada, Utpal - ERS[VASAVADA@ers.usda.gov]; pcraddick@rosslynadvisors.com[pcraddick@rosslynadvisors.com]; wmconway@att.net[wmconway@att.net]; dave.lyons@ldcom.com[dave.lyons@ldcom.com]; Dave Lyons (david.lyons@ldcom.com)[david.lyons@ldcom.com]; Lyons, David C.[David.Lyons@FaegreBD.com]; Anne Steckel[asteckel@biodiesel.org]; Larry Schafer (lschafer@dcdiamondgroup.com)[lschafer@dcdiamondgroup.com]; ethanolrfa@aol.com[ethanolrfa@aol.com]; Haq, Zia[Zia.Haq@ee.doe.gov]; Stokes, Bryce (CONTR)[Bryce.Stokes@ee.doe.gov]; hosein.shapouri@yahoo.com[hosein.shapouri@yahoo.com]  
**From:** John McClelland  
**Sent:** Mon 7/21/2014 7:30:51 PM  
**Subject:** RE: Gathering at Clyde's for Roger

All:

I am unfortunately at a board meeting on Wednesday. However, I wish you all well and hopefully Hosein and Jim can tell a good story for all of us.

**John**

John W. McClelland Ph.D.

Vice President, Government Affairs

and Chief Economist

American Rental Association

202-289-4460

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ED\_000313\_O365\_00002491

**From:** Baumes, Harry - OCE [mailto:HBaumes@oce.usda.gov]

**Sent:** Monday, July 21, 2014 2:46 PM

**To:** Randy Russell; cfdcinc@aol.com; Lloyd Ritter; John McClelland; ecs.obrien4@comcast.net; Argyropoulos, Paul (Argyropoulos.Paul@epa.gov); Samantha Slater; Duffield, James - OCE; Xiarchos, Irene - OCE; Vasavada, Utpal - ERS; pcraddick@rosslynadvisors.com; wmconway@att.net; dave.lyons@ldcom.com; Dave Lyons (david.lyons@ldcom.com); Lyons, David C.; Anne Steckel; Larry Schafer (lschafer@dcdiamondgroup.com); ethanolrfa@aol.com; Haq, Zia; Stokes, Bryce (CONTR); hosein.shapouri@yahoo.com

**Cc:** Baumes, Harry - OCE

**Subject:** Gathering at Clyde's for Roger

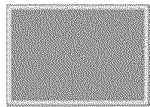
All –

Clyde's was a favorite hangout of Roger Conway's. With Roger's brother Bill's acceptance, I am organizing a meeting this Wednesday, JULY 23, 2014, at Clyde's on 7<sup>th</sup> St NW, so that Roger's friends can raise a beer to his memory and share some stories. Right now we would convene at one of the four bars at Clyde's. We will begin at 5:00 pm.

If you are a definite, please let me know.

Please extend this invitation to those who would be interested.

Clyde's of Gallery Place



707 7th St NW, Washington, DC

Gallery Place

(202) 349-3700 () · [clydes.com](http://clydes.com)

Thanks

Harry

**Harry S. Baumes Ph. D.**

Director

Office of Energy Policy and New Uses

Office of the Chief Economist

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(C) 202-423-9378

(F) 202-401-0533

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**To:** Randy Russell[rrussell@russellgroupdc.com]; cfdcinc@aol.com[cfdcinc@aol.com]; Lloyd Ritter[lritter@greencapitol.net]; john.mcclelland@ararental.org[john.mcclelland@ararental.org]; ecs.obrien4@comcast.net[ecs.obrien4@comcast.net]; Argyropoulos, Paul[Argyropoulos.Paul@epa.gov]; Samantha Slater[SSlater@ethanolrfa.org]; Duffield, James - OCE[JDuffield@oce.usda.gov]; Xiarchos, Irene - OCE[IXiarchos@oce.usda.gov]; Vasavada, Utpal - ERS[VASAVADA@ers.usda.gov]; pcraddick@rosslynadvisors.com[pcraddick@rosslynadvisors.com]; wmconway@att.net[wmconway@att.net]; dave.lyons@ldcom.com[dave.lyons@ldcom.com]; Dave Lyons (david.lyons@ldcom.com)[david.lyons@ldcom.com]; Lyons, David C.[David.Lyons@FaegreBD.com]; Anne Steckel[asteckel@biodiesel.org]; Larry Schafer (lschafer@dcdiamondgroup.com)[lschafer@dcdiamondgroup.com]; ethanolrfa@aol.com[ethanolrfa@aol.com]; Haq, Zia[Zia.Haq@ee.doe.gov]; Stokes, Bryce (CONTR)[Bryce.Stokes@ee.doe.gov]; hosein.shapouri@yahoo.com[hosein.shapouri@yahoo.com]  
**Cc:** Baumes, Harry - OCE[HBaumes@oce.usda.gov]  
**From:** Baumes, Harry - OCE  
**Sent:** Mon 7/21/2014 6:45:38 PM  
**Subject:** Gathering at Clyde's for Roger

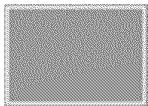
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Gallery Place

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Thanks

Harry

**Harry S. Baumes Ph. D.**

Director

Office of Energy Policy and New Uses

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**From:** Jonathan Birdsong  
**Sent:** Thur 7/10/2014 2:46:48 PM  
**Subject:** Fwd: Arundo donax importation and Chemtex  
[IBP Cover letter for RFS Registration.pdf](#)  
[ATT00001.htm](#)  
[Chemtex - EPA biofuel response - signed.pdf](#)  
[ATT00002.htm](#)

Paul and Sharyn -

Is there a time this week or next that we can follow up on this? I want to make sure the Agency has everything they need from us.

Thanks,

Jonathan Birdsong  
BlueWater Strategies  
25 Massachusetts Ave., NW - Suite 820  
Washington, DC 20001  
(202) 589-1757 - Direct  
(202) 491-5559 - Cell  
[jbirdsong@bwstrategies.com](mailto:jbirdsong@bwstrategies.com)

Begin forwarded message:

**From:** Jonathan Birdsong <[jbirdsong@bwstrategies.com](mailto:jbirdsong@bwstrategies.com)>  
**Date:** July 2, 2014 at 11:02:44 AM EDT  
**To:** "Paul Argyropoulos ([argyropoulos.paul@epa.gov](mailto:argyropoulos.paul@epa.gov))" <[argyropoulos.paul@epa.gov](mailto:argyropoulos.paul@epa.gov)>, "Lie, Sharyn" <[Lie.Sharyn@epa.gov](mailto:Lie.Sharyn@epa.gov)>  
**Subject:** Arundo donax importation and Chemtex

Hi Paul and Sharyn –

I'm checking to see where Chemtex is in the process at EPA re: the importation of their cellulosic ethanol derived from *Arundo donax* from Italy to the U.S. (see attached letter).

As you know, according to the rule on *Arundo donax* issued last July, USDA has to approve the importation prior to EPA consideration. The USDA took the first step (attached pdf) and now it has to be approved by the EPA to clear the way for importation.



Thanks for all of your help on this. You can contact me anytime with further questions or comments.

Sincerely,

Jonathan Birdsong

BlueWater Strategies, LLC

25 Massachusetts Ave., NW – Suite 820

Washington, DC 20001

(202) 589-1757 – Direct

(202) 491-5559 – Cell

[Jbirdsong@bwstrategies.com](mailto:Jbirdsong@bwstrategies.com)



Italian Bio Products

U.S. Environmental Protection Agency  
Fuels Programs Registration (6406J)  
1200 Pennsylvania Ave., N.W.  
Washington, DC 20460

Date May 20, 2014

Subject: Foreign Renewable Fuel Producer Registration RFS-2 OTAQ

I, Alberto Cova, Production Manager of Italian Bio Products (IBP), am requesting registration of the IBP's cellulosic ethanol production facility in Crescentino, Italy as a foreign Renewable Fuel production facility under the guidelines and requirements of §80.1450(b) of EPA's RFS-2 Program. IBP will sell the cellulosic ethanol production to RFS-2 registered renewable fuel importers and will not be the RIN generator. IBP has reviewed §80.1466 and understands the additional registration requirements for a RIN generating foreign renewable fuel producer. Given the current and proposed Bonding regulations covering renewable fuel importers and foreign renewable fuel producer, Italian Bio Products has the resources and is prepared to comply with the Bonding requirements of the RFS program following the approved registration of the Crescentino renewable fuel production facility and prior to any delivery of cellulosic ethanol to a US port of entry.

IBP completed the on-line OTAQ registration process for its Crescentino, Italy 13.3 MG/yr. cellulosic ethanol production facility on March 31<sup>st</sup>, 2014, (CR-8102). The signed on-line OTAQ registration document is attached along with the listed supporting documentation below. This letter and the attached documentation will provide the required information for compliance with the registration process for a foreign renewable fuel producer under the RFS-2 program.

The construction and commissioning of IBP's Crescentino, Italy cellulosic ethanol production facility was completed February 15<sup>th</sup> of 2013. The third party engineering review was conducted by Black & Veatch and the Engineering Review Report dated March 10<sup>th</sup>, 2013 is attached. Currently, the cellulosic ethanol production from the IBP Crescentino renewable fuel production facility is sold into the European renewable fuel markets.

The Crescentino, Italy cellulosic ethanol plant employs an optimized version of the PROESA<sup>TM</sup> process, second generation cellulose to ethanol process technology developed by Chemtex Italia, SRL. The PROESA<sup>TM</sup> process produces cellulosic ethanol through hydrolysis and fermentation of cellulose and hemicelluloses from the lignocellulosic biomass obtained from a range of cellulosic feedstocks. The Crescentino plant started on a blend of arundo donax and wheat straw as the renewable feedstock. The current cellulosic ethanol production is predominately derived from wheat straw but will transition to Arundo Donax as supply of this feedstock becomes more available. Chemtex Italia has demonstrated that the PROESA<sup>TM</sup> process can produce cellulosic ethanol from a wide range of cellulosic feedstocks, including arundo donax, wheat straw, rice straw, corn stover, bagasse, miscanthus, sorghum and switch grass.

MOSELEIGH SOLINI  
GROUP

MOSELEIGH SOLINI GROUP  
10000 W. 10th Ave., Suite 100, Denver, CO 80202  
Tel: 303.751.1000 Fax: 303.751.1001  
www.moseleighsolini.com



## Italian Bio Products

Although, IBP will not be the importer of record, IBP has filed for a 40 CFR Part 79, EPA Fuel Additive Manufacturer Notification (3520-13) and when received will forward for inclusion in the registration package.

Along with the the following documents are attached:

- Signed on-line OTAQ registration document
- Renewable Fuel Producer Registration
  - Renewable Fuel Produced
  - Feedstock(s) Supply Plan
  - Process Description
  - Process Flow Chart
  - Process Heat Fuel Supply Plan
  - Mass & Energy Balance
  - Actual Peak Capacity & Baseline Volume
- Engineering Review Report

If more information is required or you need to clarification of some of the information submitted, please contact Delane Richardson (330) 352-6261 or by e-mail at [rdec328@gmail.com](mailto:rdec328@gmail.com) or [Delane.Richardson@chemtex.com](mailto:Delane.Richardson@chemtex.com).

Thank you for your timely attention to this matter.

Sincerely,

Alberto Cova  
Production Manager  
Italian Bio Products

E-mail copies of this cover letter only to:

Paul Argyropoulos  
Vincent Camobroco  
Michael J. McAdams  
Thomas J. Hond

MOSSI GHISCI

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Animal and Plant  
Health Inspection  
Service

1400 Independence, S.W.  
Washington, DC 20250

Ms. Delane Richardson  
Chemtex International, Inc.  
1975 Eastwood Rd  
Wilmington, NC 28403

**FEB 21 2014**

Dear Ms. Richardson:

Subject: USDA Conclusion regarding Chemtex International Inc. Application for use of *Arundo donax* for biofuel production in Crescentino, Italy

This letter is in response to your application to the Environmental Protection Agency (EPA) for a Renewable Identification Number (RIN) for biofuel production from *Arundo donax* in Italy. This letter is required by EPA Regulation 40 CFR 80.1450(b)(1)(x)(B)(2): "A letter from the United States Department of Agriculture ("USDA") to the renewable fuel producer stating USDA's conclusions and the basis therefore regarding whether the *Arundo donax* or *Pennisetum purpureum* does or does not present a significant likelihood of spread beyond the planting area of the feedstock used for production of the renewable fuel as proposed by the producer or importer."

Based on the information supplied in and with your application and guidance from the EPA in December 2013 regarding their intent in the regulations, the USDA Biofuels Team ("USDA") has concluded that the planting of *Arundo donax* in the vicinity of Crescentino, Italy, does not present a significant likelihood of spread beyond the planting area.

The "Park Authority", or "Ente-Parco", the local authority with responsibility for this environmental area, states "The *Arundo donax* species, grown in biomass production transplantation used in the plant for production of bioethanol is a highly invasive exotic species, whose cultivation in protected areas and in areas of the Natura 2000 Network, particularly the flood plains, must be controlled to protect existing habitats". To address their concerns, the Park Authority entered into an agreement with Chemtex International Inc. that requires buffers, a minimum distance from riparian areas and regular monitoring to prevent spread from the growing area and other mitigations. In a conference call on 31 October 2013 between USDA and Chemtex International Inc., Tim Columbus as a representative for Chemtex International Inc. stated that an agreement with the same mitigations applies to all other producers of *A. donax* which is limited to a 50 Km radius of your biofuel plant within the Italian "Piedmont." This agreement between the Park Authority and Chemtex International Inc., which has numerous mitigations in place to monitor and prevent the spread of plantings of *A. donax*, is the primary basis for our conclusion for this biofuel production application in Crescentino, Italy.

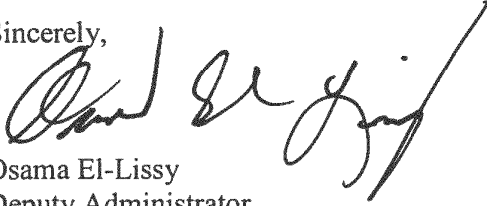
We did not consider risks that may be associated with the harvest and transportation of *Arundo*, or with the location of sites of cultivation with respect to riparian areas or flood plains as these are the purviews of the local authority. Since the local authority

Ms. Delane Richardson  
Page 2

considers their concerns to be addressed, we did not evaluate these risks any further.

The above notwithstanding, USDA assumes no liability in regards to the biofuel planting or any resultant spread. This determination is not to be considered a precedent regarding any other applications we may receive regarding plantings in other locations in Italy or any other country.

Sincerely,

A handwritten signature in black ink, appearing to read 'Osama El-Lissy', with a long, sweeping horizontal stroke extending to the right.

Osama El-Lissy  
Deputy Administrator  
Plant Protection and Quarantine

**To:** Argyropoulos, Paul[Argyropoulos.Paul@epa.gov]  
**From:** Larry Schafer  
**Sent:** Thur 7/10/2014 12:51:46 PM  
**Subject:** RE: are you back in DC

How was your trip ...

Couple of rumor mill items I would like to talk through with you ...

Call if you get a moment ... (not a rush)

Thanks

-----  
Larry Schafer

National Biodiesel Board

O: 202.737.8801

M: 202.997.8072

[LSchafer@Biodiesel.org](mailto:LSchafer@Biodiesel.org)

-----  
**Biodiesel – America's Advanced Biofuel!**

[www.americasadvancedbiofuel.com](http://www.americasadvancedbiofuel.com)

1331 Pennsylvania Ave. NW

Suite 505

Washington DC 20004

**From:** Argyropoulos, Paul [mailto:Argyropoulos.Paul@epa.gov]  
**Sent:** Thursday, July 10, 2014 8:33 AM  
**To:** Larry Schafer  
**Subject:** RE: are you back in DC

Yes, but I'm gone all day today and then out until next week. Saw Lindsay briefly last night.

Paul Argyropoulos

Senior Policy Advisor

US EPA

Office of Transportation and Air Quality

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Mobile: 202-577-9354

Email: [argyropoulos.paul@epa.gov](mailto:argyropoulos.paul@epa.gov)

Web: [www.epa.gov](http://www.epa.gov)

**From:** Larry Schafer [mailto:lschafer@dcdiamondgroup.com]  
**Sent:** Thursday, July 10, 2014 8:25 AM  
**To:** Argyropoulos, Paul  
**Subject:** are you back in DC

=====

Larry Schafer

t: 202.997.8072

=====



**To:** Argyropoulos, Paul[Argyropoulos.Paul@epa.gov]  
**From:** Michael.McAdams@hklaw.com  
**Sent:** Tue 7/8/2014 7:53:08 PM  
**Subject:** RE: you free for lunch any day this week?

Great see you there

**Michael McAdams** | Holland & Knight  
Sr Policy Advisor  
800 17th Street, NW Suite 1100 | Washington DC 20006  
Phone 202.469.5140 | Fax 202.955.5564  
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**From:** Argyropoulos, Paul [mailto:Argyropoulos.Paul@epa.gov]  
**Sent:** Tuesday, July 08, 2014 3:52 PM  
**To:** McAdams, Michael J (WAS - X75140)  
**Subject:** RE: you free for lunch any day this week?

How about 11:30?

Paul Argyropoulos

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US EPA

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That sound great. I have not been to Old Ebbit in years.

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How about we meet at Chef Geoff's or Old Ebbit

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**To:** Argyropoulos, Paul  
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Pasta Place. What is the name of it?

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Sr Policy Advisor

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**To:** Argyropoulos, Paul[Argyropoulos.Paul@epa.gov]  
**From:** Michael.McAdams@hklaw.com  
**Sent:** Tue 7/8/2014 7:31:50 PM  
**Subject:** RE: you free for lunch any day this week?

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**Sent:** Tuesday, July 08, 2014 2:50 PM  
**To:** Argyropoulos, Paul  
**Subject:** RE: you free for lunch any day this week?

That would be terrific. If you have a little time we can move from across the street, but totally your call.

**Michael McAdams** | **Holland & Knight**  
Sr Policy Advisor  
800 17th Street, NW Suite 1100 | Washington DC 20006  
Phone 202.469.5140 | Fax 202.955.5564  
[michael.mcadams@hklaw.com](mailto:michael.mcadams@hklaw.com) | [www.hklaw.com](http://www.hklaw.com)

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**From:** Argyropoulos, Paul [<mailto:Argyropoulos.Paul@epa.gov>]  
**Sent:** Tuesday, July 08, 2014 2:48 PM  
**To:** McAdams, Michael J (WAS - X75140)  
**Subject:** RE: you free for lunch any day this week?

How about tomorrow?

Paul Argyropoulos

Senior Policy Advisor

US EPA

Office of Transportation and Air Quality

Phone: 202-564-1123

Mobile: 202-577-9354

Email: [argyropoulos.paul@epa.gov](mailto:argyropoulos.paul@epa.gov)

Web: [www.epa.gov](http://www.epa.gov)

**From:** Michael.McAdams@hklaw.com [<mailto:Michael.McAdams@hklaw.com>]

**Sent:** Tuesday, July 08, 2014 11:10 AM

**To:** Argyropoulos, Paul

**Subject:** you free for lunch any day this week?

**Michael McAdams | Holland & Knight**

Sr Policy Advisor

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**To:** Argyropoulos, Paul[Argyropoulos.Paul@epa.gov]  
**From:** Michael.McAdams@hklaw.com  
**Sent:** Tue 7/8/2014 6:53:18 PM  
**Subject:** RE: you free for lunch any day this week?

There is a good pasta place on 13<sup>th</sup> and F and always good is Ocean Air.

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**From:** Argyropoulos, Paul [mailto:Argyropoulos.Paul@epa.gov]  
**Sent:** Tuesday, July 08, 2014 2:52 PM  
**To:** McAdams, Michael J (WAS - X75140)  
**Subject:** RE: you free for lunch any day this week?

Sounds good. Where?

Paul Argyropoulos

Senior Policy Advisor

US EPA

Office of Transportation and Air Quality

Phone: 202-564-1123

Mobile: 202-577-9354

Email: [argyropoulos.paul@epa.gov](mailto:argyropoulos.paul@epa.gov)

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**Sent:** Tuesday, July 08, 2014 11:10 AM

**To:** Argyropoulos, Paul

**Subject:** you free for lunch any day this week?

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**To:** Argyropoulos, Paul[Argyropoulos.Paul@epa.gov]  
**From:** Michael.McAdams@hklaw.com  
**Sent:** Tue 7/8/2014 6:50:02 PM  
**Subject:** RE: you free for lunch any day this week?

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**To:** Argyropoulos, Paul[Argyropoulos.Paul@epa.gov]  
**From:** Michael.McAdams@hklaw.com  
**Sent:** Tue 7/8/2014 3:10:06 PM  
**Subject:** you free for lunch any day this week?

**Michael McAdams | Holland & Knight**

Sr Policy Advisor

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**To:** Argyropoulos, Paul[Argyropoulos.Paul@epa.gov]  
**From:** Michael.McAdams@hklaw.com  
**Sent:** Mon 7/7/2014 2:54:44 PM

Paul: Hope you had a good week last week. Couple of questions, given the number of things you removed from the rule are their plans in the short term to take them back up such as the one pound waiver for butanol? Second, who are we dealing with when you talk about in situ, biochemical hydrolyzed treatment. Are we trying to separate out the C-6 sugars? Thanks.

**Michael McAdams | Holland & Knight**

**President, ABFA**  
Sr Policy Advisor  
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**To:** Argyropoulos, Paul[Argyropoulos.Paul@epa.gov]; Lie, Sharyn[Lie.Sharyn@epa.gov]  
**From:** Jonathan Birdsong  
**Sent:** Wed 7/2/2014 3:02:44 PM  
**Subject:** Arundo donax importation and Chemtex  
[IBP Cover letter for RFS Registration.pdf](#)  
[Chemtex - EPA biofuel response - signed.pdf](#)

Hi Paul and Sharyn –

I'm checking to see where Chemtex is in the process at EPA re: the importation of their cellulosic ethanol derived from *Arundo donax* from Italy to the U.S. (see attached letter).

As you know, according to the rule on *Arundo donax* issued last July, USDA has to approve the importation prior to EPA consideration. The USDA took the first step (attached pdf) and now it has to be approved by the EPA to clear the way for importation.

Thanks for all of your help on this. You can contact me anytime with further questions or comments.

Sincerely,

Jonathan Birdsong

BlueWater Strategies, LLC

25 Massachusetts Ave., NW – Suite 820

Washington, DC 20001

(202) 589-1757 – Direct

(202) 491-5559 – Cell

Jbirdsong@bwstrategies.com





Date May 20, 2014

**Subject: Foreign Renewable Fuel Producer Registration RFS-2 OTAQ**

IBP completed the on-line OTAQ registration process for its Crescentino, Italy 13.3 MG/yr. cellulosic ethanol production facility on March 31<sup>st</sup>, 2014, (CR-8102). The signed on-line OTAQ registration document is attached along with the listed supporting documentation below. This letter and the attached documentation will provide the required information for compliance with the registration process for a foreign renewable fuel producer under the RFS-2 program.

The construction and commissioning of IBP's Crescentino, Italy cellulosic ethanol production facility was completed February 15<sup>th</sup> of 2013. The third party engineering review was conducted by Black & Veatch and the Engineering Review Report dated March 10<sup>th</sup>, 2013 is attached. Currently, the cellulosic ethanol production from the IBP Crescentino renewable fuel production facility is sold into the European renewable fuel markets.

The Crescentino, Italy cellulosic ethanol plant employs an optimized version of the PROESA<sup>TM</sup> process, second generation cellulose to ethanol process technology developed by Chemtex Italia, SRL. The PROESA<sup>TM</sup> process produces cellulosic ethanol through hydrolysis and fermentation of cellulose and hemicelluloses from the lignocellulosic biomass obtained from a range of cellulosic feedstocks. The Crescentino plant started on a blend of arundo donax and wheat straw as the renewable feedstock. The current cellulosic ethanol production is predominately derived from wheat straw but will transition to Arundo Donax as supply of this feedstock becomes more available. Chemtex Italia has demonstrated that the PROESA<sup>TM</sup> process can produce cellulosic ethanol from a wide range of cellulosic feedstocks, including arundo donax, wheat straw, rice straw, corn stover, bagasse, miscanthus, sorghum and switch grass.

MOSS, G. H. SOIL



## Italian Bio Products

Although, IBP will not be the importer of record, IBP has filed for a 40 CFR Part 79, EPA Fuel Additive Manufacturer Notification (3520-13) and when received will forward for inclusion in the registration package.

Along with the the following documents are attached:

- Signed on-line OTAQ registration document
- Renewable Fuel Producer Registration
  - Renewable Fuel Produced
  - Feedstock(s) Supply Plan
  - Process Description
  - Process Flow Chart
  - Process Heat Fuel Supply Plan
  - Mass & Energy Balance
  - Actual Peak Capacity & Baseline Volume
- Engineering Review Report

If more information is required or you need to clarification of some of the information submitted, please contact Delane Richardson (330) 352-6261 or by e-mail at [rdec328@gmail.com](mailto:rdec328@gmail.com) or [Delane.Richardson@chemtex.com](mailto:Delane.Richardson@chemtex.com).

Thank you for your timely attention to this matter.

Sincerely,

Alberto Cova  
Production Manager  
Italian Bio Products

E-mail copies of this cover letter only to:

Paul Argyropoulos  
Vincent Camobroco  
Michael J. McAdams  
Thomas J. Hond

MOSSI GHISCI

Stampa del foglio di lavoro. Il foglio di lavoro è un documento che contiene informazioni importanti per la produzione. È importante che tutti i dipendenti siano a conoscenza delle informazioni contenute in questo documento. Il foglio di lavoro è un documento che contiene informazioni importanti per la produzione. È importante che tutti i dipendenti siano a conoscenza delle informazioni contenute in questo documento.



Animal and Plant  
Health Inspection  
Service

1400 Independence, S.W.  
Washington, DC 20250

Ms. Delane Richardson  
Chemtex International, Inc.  
1975 Eastwood Rd  
Wilmington, NC 28403

**FEB 21 2014**

Dear Ms. Richardson:

Subject: USDA Conclusion regarding Chemtex International Inc. Application for use of *Arundo donax* for biofuel production in Crescentino, Italy

This letter is in response to your application to the Environmental Protection Agency (EPA) for a Renewable Identification Number (RIN) for biofuel production from *Arundo donax* in Italy. This letter is required by EPA Regulation 40 CFR 80.1450(b)(1)(x)(B)(2): "A letter from the United States Department of Agriculture ("USDA") to the renewable fuel producer stating USDA's conclusions and the basis therefore regarding whether the *Arundo donax* or *Pennisetum purpureum* does or does not present a significant likelihood of spread beyond the planting area of the feedstock used for production of the renewable fuel as proposed by the producer or importer."

Based on the information supplied in and with your application and guidance from the EPA in December 2013 regarding their intent in the regulations, the USDA Biofuels Team ("USDA") has concluded that the planting of *Arundo donax* in the vicinity of Crescentino, Italy, does not present a significant likelihood of spread beyond the planting area.

The "Park Authority", or "Ente-Parco", the local authority with responsibility for this environmental area, states "The *Arundo donax* species, grown in biomass production transplantation used in the plant for production of bioethanol is a highly invasive exotic species, whose cultivation in protected areas and in areas of the Natura 2000 Network, particularly the flood plains, must be controlled to protect existing habitats". To address their concerns, the Park Authority entered into an agreement with Chemtex International Inc. that requires buffers, a minimum distance from riparian areas and regular monitoring to prevent spread from the growing area and other mitigations. In a conference call on 31 October 2013 between USDA and Chemtex International Inc., Tim Columbus as a representative for Chemtex International Inc. stated that an agreement with the same mitigations applies to all other producers of *A. donax* which is limited to a 50 Km radius of your biofuel plant within the Italian "Piedmont." This agreement between the Park Authority and Chemtex International Inc., which has numerous mitigations in place to monitor and prevent the spread of plantings of *A. donax*, is the primary basis for our conclusion for this biofuel production application in Crescentino, Italy.

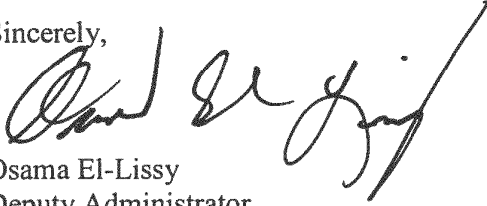
We did not consider risks that may be associated with the harvest and transportation of *Arundo*, or with the location of sites of cultivation with respect to riparian areas or flood plains as these are the purviews of the local authority. Since the local authority

Ms. Delane Richardson  
Page 2

considers their concerns to be addressed, we did not evaluate these risks any further.

The above notwithstanding, USDA assumes no liability in regards to the biofuel planting or any resultant spread. This determination is not to be considered a precedent regarding any other applications we may receive regarding plantings in other locations in Italy or any other country.

Sincerely,

A handwritten signature in black ink, appearing to read 'Osama El-Lissy', with a long, sweeping horizontal stroke extending to the right.

Osama El-Lissy  
Deputy Administrator  
Plant Protection and Quarantine